## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

LETTUCE ENTERTAIN YOU ENTERPRISES INC	) ) ) 
Plaintiff,	<ul><li>Civil Action. No. 09-CV-2582</li><li>Honorable Joan Humphrey Lefkow</li></ul>
v.	) )
LEILA SOPHIA AR, LLC D/B/A	)
LETTUCE MIX, AND SHAHRAN	
TEHRANI Defendants.	)
	) )

## DEFENDANT'S MOTION FOR EXTENSION OF TIME TO SUBMIT PROPOSED ORDER REGARDING PRELIMINARY INJUNCTION

Defendant, Leila Sophia Ar, LLC d/b/a Lettuce Mix, by and through its attorneys, hereby moves this Court to grant Defendants an additional fourteen (14) days to submit to chambers, via the proposed order mailbox on Judge Lefkow's website, a proposed injunction order, and in support thereof, Defendant states as follows:

- 1. On February 26, 2010, this Court entered an order granting Plaintiff's temporary restraining order and preliminary injunction.
- 2. On April 8, 2010, at a status hearing (and Plaintiff's motion for leave to file first amended complaint), this Court entered a briefing schedule, allowing Defendant 21 days, or until April 29, 2010 to file a response, and giving Plaintiff until May 13, 2010, to file a reply.
- 3. On April 15, 2010, counsel for Plaintiff sent an e-mail, dated 2:37 p.m., stating that he had a "proposed agreed order," which was previously ordered to be filed via the proposed

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order mailbox on Judge Lefkow's website by April 15, 2010. (See April 15, 2010, letter attached

as exhibit "A").

4. In his April 15, 2010, correspondence, Plaintiff's counsel stated "If I don't hear

from you this afternoon, we will file the proposed Order on behalf of Lettuce Entertain You to

ensure our compliance with the Court's April 8<sup>th</sup> Order." (See exhibit "A").

5. Defendant's counsel sent a response e-mail stating that Plaintiff's proposed order

language is unacceptable, and that counsel has been unable to review this order's language with

their client and co-counsel in order to reach mutually agreeable language. (See Defendant's

response e-mail attached as exhibit "B").

6. Due to the pendency of other motions before this Court in this matter, Counsel

requests an additional fourteen (14) days for both parties to work together in order to submit the

proposed agreed injunction order.

7. This extension does not prejudice the Plaintiff's case in any way being that the

parties have well over fourteen days, specifically until May 13, 2010, to file all briefs related to

amending Plaintiff's complaint.

WHEREFORE, Defendant, Leila Sophia Ar, LLC d/b/a Lettuce Mix, by and through its

undersigned attorneys, respectfully request this honorable court grant the defendant an additional

fourteen (14) days, until April 29, 2010, to file a proposed agreed injunction order.

DATED:

April 15, 2010

THE DERATANY FIRM

By: /s/Jay Paul Deratany\_

Attorney for Defendants

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